

Lynn S. Walsh, OSB #924955
email: lynn@lynnwalshlaw.com
610 SW Alder St., #415
Portland, Oregon 97205
Telephone: 503-790-2772
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

J.B.,

Plaintiff,

vs.

LEVI GRAY et al.,

Defendants.

NO. 3:23-cv-01962-CL

DECLARATION OF LYNN S.
WALSH IN SUPPORT OF MOTION
TO EXTEND CASE MANAGEMENT
DEADLINES

I, Lynn S. Walsh, declare as follows pursuant to 28 USC§1746:

1. I represent the plaintiff in the above-captioned matter. I have personal knowledge of the information contained in this declaration. If called upon to do so, I could and would competently testify regarding the matters set forth herein.
2. This declaration is made in support of plaintiff's second Motion to Extend Case Management Deadlines. Plaintiff seeks to extend the case management deadlines by about five months.

3. The parties have already engaged in significant discovery through numerous public records requests, by Plaintiff's First Request for Production that was served upon the State defendants (all defendants excluding Gray) on March 18, 2024, Plaintiff's Second Request for Production served upon the State defendants on October 25, 2024, multiple subpoenas, and several discovery requests served upon defendant Gray.
4. The State defendants have produced more than 14,000 documents and videos responsive to the First and Second Requests for Production. Plaintiff is still waiting for numerous additional documents pursuant to the two Requests, and expects at least another 5000 pages.
5. The parties have scheduled a settlement conference with Judge Beckerman to take place on May 20, 2025. As a result, the parties wish to suspend the taking of depositions until after the settlement conference, should the case does not settle. Therefore, the parties are requesting an extension of the trial management dates in order to take multiple depositions, and complete fact discovery. Plaintiff expects to take at least 10 depositions.
6. This motion is made in good faith and not for the purposes of delay. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 21, 2025 at White Salmon, WA.

/s/ Lynn S. Walsh
Lynn S. Walsh, OSB #92495
Attorney for plaintiff

CERTIFICATE OF SERVICE

I certify that I mailed via first class mail and email the following DECLARATION OF LYNN S. WALSH IN SUPPORT OF MOTION TO EXTEND CASE MANAGEMENT DEADLINES on March 21, 2025 to the following individuals:

Levi Gray
2232 SE Pine St. #7
Portland, OR 97214
levvus007@gmail.com

/s/ Lynn S. Walsh
Lynn S. Walsh, OSB #924955
Attorney for plaintiff